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Office of Secretary

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December 15, 1999

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Ex Parte Filing
CC Docket No. 99-200

Dear Ms. Salas:

On December 14, 1999 Richard A. Karre and Tina S. Pyle of MediaOne Group (participating by speakerphone) and John E. Logan and Robert W. Spangler of Wallman Strategic Consulting, LLC met with L. Charles Keller, Blaise Scinto, Diane Griffin Harmon, Patrick E. Forster, Aaron N. Goldberger, Tejal Mehta, Barry Payne and Les Selzer of the Network Services Division, Common Carrier Bureau, concerning the referenced proceeding. The MediaOne representatives described the company's operation as a competitive local exchange carrier and the adverse impact that the shortage of numbers is having on its operations in certain states.

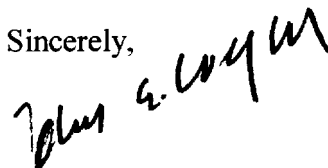
MediaOne recommended that the Commission adopt an order quickly resolving certain issues in this proceeding -- especially the issuance of guidelines for thousands-block number pooling. The details of MediaOne's recommendations are contained in the enclosed 11-page document, which was distributed at the meeting.

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In accordance with the Commission's rules, the original and one copy of this letter and its enclosure are being filed with the Office of the Secretary for inclusion in the public record.

Sincerely,

A handwritten signature in black ink, appearing to read "John E. Logan", written in a cursive style.

John E. Logan

Enclosure

cc: L. Charles Keller (w/o enclosure)
Blaise Scinto "
Diane Griffin Harmon "
Patrick Forster "
Aaron N. Goldberger "
Tejal Mehta "
Barry Payne "
Les Selzer "

**Creating Consumer Choice
In Local Telecommunications:
Optimizing Numbering Resources**

December 14, 1999

FCC CC Docket No. 99-200, 96-98

Agenda

- Advocate a two-phase process to ordering number optimization measures.
 - Detail phase 1 or “fast-track” measures:
 - Thousands-block number pooling, including cost recovery.
- Urge rejection of attempts to “slow-roll” thousands-block numbering pooling.
- Advocate continuation of mandatory ten-digit dialing when NPA relief is achieved via an overlay area code.

A Two-Phase Process

- The lack of sufficient numbering resources is a formidable barrier to local entry.
 - MediaOne's market entry plans have been delayed due to a lack of numbering resources in California and in the northeastern United States.
- To remove this significant barrier -- that is, to alleviate number exhaust -- numbering measures must be implemented expeditiously.
 - MediaOne recommends a two-phase process to achieve this objective.

A Two Phase Approach To Number Optimization

Phase 1 - “Fast Track”

- Order thousands-block number pooling:
 - Top 100 MSAs and “current” jeopardy areas by 7/1/01.
- Order additional measures.
- Establish cost recovery mechanism.
- Establish parameters of authority for all states, avoiding piecemeal delegation.

Phase 2

- Address remaining issues in NPRM after evaluating the results from phase 1.

Phase 1: Order Thousands-Block Number Pooling in the Top 100 MSAs

- Adopt INC Thousands-Block Number Pooling Guidelines for LNP-capable carriers.
 - A uniform set of federal rules and definitions is the most efficient and effective method of implementing pooling across the country.
- Order mandatory thousands-block number pooling in the top 100 MSAs and “current” jeopardy areas.
 - Require implementation of pooling on a “staggered” schedule beginning 10/1/00 with completion by 7/1/01.
 - Require that pooling be implemented in other areas by 7/1/03.

Phase 1: Order Additional Number Conservation Measures

- Establish a uniform set of federal definitions and rules to optimize number utilization before pooling is implemented.
 - For example, verification rules, reporting/record-keeping requirements, audits, enforcement processes and reclamation.
 - Require implementation by 7/1/00.

Phase 1: Establish Cost Recovery Mechanism

- The FCC has recognized that a cost recovery system must be competitively neutral.
- Under such a system:
 - Carrier-specific costs should be borne by each individual carrier.
 - A revenue-based allocator should be used for industry-wide costs.
 - Intrastate, interstate and international end-user telecommunications revenues.
 - Allow CLECs to recover their costs in any lawful manner.

Phase 1: Establish Parameters of Authority for All States

- Numerous states have petitioned for and received additional numbering authority.
 - Additional petitions are likely.
- Requiring implementation of thousands-block pooling and additional conservation measures obviates the need for additional state petitions.

Reject Attempts To Limit Or Delay A Comprehensive Pooling Plan

- Rate center consolidation allows carriers to serve many more customers with fewer NXXs.
- Implementation of rate center consolidation and the use of thousands-block number pooling are an optimal near-term solution to the current numbering dilemma.
 - However, these two measures should not be explicitly linked. To do so would only slow the efficient utilization of precious numbering resources and result in little, if any, choice for residential telephony services.

Ten-Digit Dialing With Area Code Overlays Enables Effective Competition

- Some ILECs advocate that mandatory 10-digit dialing impedes efficient area code relief.
- The FCC must continue with the mandate.
 - While some ILECs claim that LNP promotes competition without the 10-digit requirement, this is not true.
 - In two of MediaOne's markets, half of its customers choose a MediaOne "native" telephone number.
- Without mandatory 10-digit dialing, new entrants are severely disadvantaged.

Summary

- Adopt INC Thousands-Block Number Pooling Guidelines.
- Order thousands-block number pooling in two stages -- the top 100 MSAs and “current” jeopardy areas first. Order additional measures.
- Establish a cost recovery mechanism.
- Continue mandatory 10-digit dialing when NPA relief is achieved via an area code overlay.